

Jason R. Burt (Utah State Bar No. 11200)
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004-1304
Telephone: (202) 637-2200
Email: jason.burt@lw.com

*Counsel for Defendants The Church of Jesus
Christ of Latter-day Saints and Ensign Peak
Advisors, Inc.*

James E. Magleby (Utah Bar No. 7247)
Yevgen Kovalov (Utah Bar No. 16297)
MAGLEBY CATAXINOS, PC
141 West Pierpont Avenue
Salt Lake City, Utah 84101-3605
Telephone: (801) 359-9000
Email: magleby@mcpc.law
kovalov@mcpc.law

Interim Liaison Counsel

Additional counsel listed on Signature Page

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

IN RE: THE CHURCH OF JESUS CHRIST
OF LATTER-DAY SAINTS TITHING
LITIGATION

This document relates to all actions.

**JOINT SUBMISSION IN ADVANCE OF
THE JANUARY 17, 2025 HEARING OF
“LETTER TO AN IRS DIRECTOR”**

Case No. 2:24-md-03102-RJS-DAO

Chief Judge Robert J. Shelby

Magistrate Judge Daphne A. Oberg

Pursuant to the request of the Court on January 8, 2025, Plaintiffs Daniel Chappell, Masen Christensen, John Oaks, Mark Wilson, Joel Long, Brandall Brawner, Kevin Risdon, Gene Judson, and Michelle Judson, and Defendants The Church of Jesus Christ of Latter-day Saints and Ensign Peak Advisors, Inc. jointly submit the “Letter to an IRS Director” (attached hereto as Exhibit “A”).

Date: January 10, 2025

Respectfully submitted,

/s/ James E. Magleby

James E. Magleby (Utah Bar No. 7247)
Yevgen Kovalov (Utah Bar No. 16297)
MAGLEBY CATAXINOS, PC
141 W. Pierpont Avenue
Salt Lake City, Utah 84101-3605
Telephone: (801) 359-9000
Email: magleby@mcpc.law
kovalov@mcpc.law

Christopher A. Seeger (*pro hac vice*)
SEEGER WEISS LLP
55 Challenger Road, 6th Floor
Ridgefield Park, New Jersey 07660
Telephone: (973) 639-9100
Email: cseeger@seegerweiss.com

Scott A. George (*pro hac vice*)
Frazar W. Thomas (*pro hac vice*)
SEEGER WEISS LLP
325 Chestnut Street, Suite 917
Philadelphia, Pennsylvania 19106
Telephone: (215) 564-2300
Email: sgeorge@seegerweiss.com
fthomas@seegerweiss.com

Scott A. Kitner (*pro hac vice*)
Martin D. Woodward (*pro hac vice*)
KITNER WOODWARD PLLC
13101 Preston Road, Suite 110
Dallas, Texas 75240
Telephone: (214) 443-4300
Email: scott@kitnerwoodward.com
martin@kitnerwoodward.com

Steven A. Schwartz (*pro hac vice*)
Beena M. McDonald (*pro hac vice*)
Marissa N. Pembroke (*pro hac vice*)
CHIMICLES SCHWARTZ KRINER &
DONALDSON-SMITH LLP
361 West Lancaster Avenue
Haverford, Pennsylvania 19041
Telephone: (610) 642-8500
Email: steveschwartz@chimicles.com
bmm@chimicles.com
marissapembroke@chimicles.com

Interim Liaison Counsel and Interim Class Counsel.

/s/ Jason R. Burt (with permission)

Jason R. Burt (Utah State Bar No. 11200)
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004-1304
Telephone: (202) 637-2200
Email: jason.burt@lw.com

David J. Jordan (Utah State Bar No. 1751)
Wesley F. Harward (Utah State Bar No. 15623)
FOLEY & LARDNER LLP
95 South State Street, Suite 2500
Salt Lake City, Utah 84111
Telephone: (801) 401-8900
Email: djordan@foley.com
wharward@foley.com

Randy T. Austin (Utah State Bar No. 6171)
Wade L. Woodard (Utah State Bar No. 18155)
Justin W. Starr (Utah State Bar No. 10708)
KIRTON MCCONKIE PC
36 South State Street, Suite 1900
Salt Lake City, Utah 84111
Telephone: (801) 328-3600
Email: raustin@kmclaw.com
wwoodard@kmclaw.com
jstarr@kmclaw.com

Mark S. Mester (*pro hac vice*)
LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611
Telephone: (312) 876-7700
Email: mark.mester@lw.com

*Counsel for Defendants The Church of Jesus Christ
of Latter-day Saints and Ensign Peak Advisors, Inc*

CERTIFICATE OF SERVICE

On this 10th day of January, 2025, I hereby certify that I electronically filed the foregoing JOINT SUBMISSION IN ADVANCE OF THE JANUARY 17, 2025 HEARING OF “LETTER TO AN IRS DIRECTOR” with the Clerk of the Court using the CM/ECF system, which will send an electronic notification to counsel of record for all the parties.

/s/ Sasha Zito